MEMORANDUM

DATE: February 19, 1988

SUBJECT: South Cavalcade Status Meeting

FROM: James F. Pendergast
Remedial Project Manager (6H-EE)

TO: South Cavalcade Files

I met with Shannon Craig and Jim Campbell of Keystone and Bill Tobin of McBride-Ratckiff with Lynn Mays, Tony St. Clair, Jeff Saunders, and Gordon McClury of CDM assisting me along with Bill Phillips of Clements. We discussed general points and concerns about the draft RI. I gave Keystone my draft comments and promised the official mailed copy in early March.

EXECUTIVE SUMMARY

We did not discuss this. Instead, we discussed the points in the main body of the text.

SECTION 1

I told Keystone to add discussion on the magnitude and extent of the contamination. They agreed to do so, but preferred the discussion to be in the Executive Summary. I agreed.

SECTION 2

We had no major concern with this section.

SECTION 3

My general concern was the general inadequate description of methods. The discussion did not convince EPA or CDM that the work was properly done, although in the field it appeared that the work was sufficient. The major concerns were:

1. The wells in the upper intermediate aquifer may have been improperly installed. The aquifer was not sealed with a bentonite seal. The water chemistry suggests intrusion of grout in the screened areas. The slug tests suggest screening in clay layers. Bill Tobin said that infiltration was unlikely. Keystone promised a better discussion in the revised text.

2. The surrogate testing is not convincing. The statistics do not assure that the methods, especially the metals, can give an idea on the magnitude of contamination. Keystone agreed to add a better discussion

3. The sampling locations appear arbitrary. Bill Tobin said that the locations were required by John Cochran of EPA during discussions with Tobin and Shannon Craig. We dropped this point.

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4. The metals need to be filtered. Tobin said that John Cochran required total metals, and forbid filtered metals. I said with hindsight that filtered would be appropriate; otherwise, the metal data is masked by the soils. We agreed to use the total samples for the risk assessment. If found to present a risk, then Keystone will resample and filter one round from all wells.

SECTION 4

My overall concern was the upper intermediate aquifer: this does not seem to be an aquifer. Keystone agreed to not consider this zone as an aquifer. CDM said that no more field data would be needed if Keystone adopted this position.

I also had questions abouth the permeability of the surface aquifer. CDM believed that a pump test was necessary to characterize this given the uncertainties about the slug tests and well installation. Tobin said that there was no need for such a test. Creosote had already penetrated the upper aquitard, and a pump test would run dry before a response was observed. We agreed that this is an area of uncertainty, and that Keystone would be bearing the potential financial burden.

I also said that the computer generated maps of water surfaces were misleading because the computer does not interpret the hydrogeology. Tobin said that the maps were mathematically accurate. Keystone agreed to use on good map, and delete the computer drawn ones.

SECTION 5

I had problems with the use of QA/QC in reporting the data. I told Keystone to report "U" and "J" values as they occur and to not use "NA" or "--". Keystone agreed.

I also said that I disagreed with judgmental statements about comparisons to background without modeling the routes of migration. Keystone agreed to report the data and leave out the interpretations.

SECTION 6

My general concern was that the surrogates and observations did not compare. Tobin said that there was no reason for any comparison, that these could be separable. Therefore, he used either a surrogate hit or an observation to delineate areas of contamination. We agreed with this approach.

I also was concerned about the lack of CLP data. There were only two onsite samples. Keystone recognized this with hindsight, but said that Cochran approved of this. Keystone suggested to use the subsurface data to characterize the surface if the ROD will say to clean to a certain level and not to clean certain areas. I agreed.

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SECTION 7

First, I was bothered by the 50% validated sample statistic. Shannon stated that the surrogate recovery was the problem. I suggested that they look into ways to use this data.

Second, I wanted a volatile map. Tobin explained that PAHs were the concern; therefore, he focussed on these. I stated that volatiles need to be treated in the same way as PAHs because volatiles are more mobile and offer a risk. Keystone agreed to add the map.

Third, I wanted a metals map. Tobin said that he needed to resolve the metal filtration problem first. I still wanted a map because I need to see the magnitude and extent of contamination. Keystone agreed.

Fourth, I said that the vertical profile was useless. Tobin agreed, and said that it was a first cut at it. He will redo the profile using a different approach and using the surrogate data to augment the CLP data. I agreed.

SECTION 8

I did not like the use of MEGs to show that there was no contamination of concern. I told Keystone that the risk assessment was the appropriate forum for this type of discussion. Keystone agreed to change the discussion to a comparison of upwind and downwind samples. I agreed.

SECTION 9

My concerns were with the incomplete tables, the omission of lead, and lack of discussion of groundwater migration to other wells. Keystone agreed to address all these points.

FOLLOW-UP ACTION

Compile and send out comments in early March.

Keystone replies 30 days later.

FS work should not be delayed; we agree on technical points.

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